

56. Defendant TECT is a "person in any way responsible" for the discharge of hazardous substances at the Site, within the meaning of N.J.S.A. 58:10-23.11b and N.J.S.A. 58:10-23.11g.c(1).

57. Plaintiffs NJDEP and Administrator have incurred, and will continue to incur, costs to remediate the Site. Such costs are "cleanup and removal costs" within the meaning of N.J.S.A. 58:10-23.11b.

58. As a discharger of hazardous substances at the Site, TECT is a person who is strictly liable, jointly and severally, without regard to fault, for all costs plaintiffs NJDEP and Administrator have incurred, and will incur, to remediate the Site. N.J.S.A. 58:10-23.11.g.c(1).

59. As a person responsible for materials that were, or contained, hazardous substances, certain of which were unlawfully discharged and not satisfactorily stored or contained at the Site, TECT is strictly liable, jointly and severally, without regard to fault, for all costs plaintiffs NJDEP and Administrator have incurred, and will incur, to remediate the Site. N.J.S.A. 58:10-23.11.g.c(1).

60. Plaintiffs NJDEP and Administrator have also incurred, and will continue to incur, damages for any natural resource of this State that has been, or may be, damaged or destroyed by the contamination at the Site. These damages include the costs plaintiffs NJDEP and the Spill Fund have incurred, and will incur,

to assess the damage to, or destruction of, any natural resource, and the costs that plaintiffs have incurred, and will incur, to restore or replace, or oversee the restoration or replacement of, the natural resource.

61. As a discharger of hazardous substances at the Site, TECT is a person who is strictly liable, jointly and severally, without regard to fault, for all damages that plaintiffs NJDEP and Administrator have incurred, and will incur, to restore or replace any natural resource of this State damaged or destroyed by the contamination at the Site. N.J.S.A. 58:10-23.11.g.c(1).

62. By failing to comply with the November 11, 2000 Directive, TECT is also a person who, pursuant to N.J.S.A. 58:10-23.11f.a(1), is liable in an amount equal to three times the cleanup and removal costs that plaintiffs NJDEP and Administrator have incurred, and will incur, for the Site.

SECOND COUNT

63. Plaintiffs NJDEP and Administrator repeat each and every allegation of paragraphs 1 through 62 above as though fully set forth in its entirety herein.

64. At all times relevant in this action, Patrick was the president and/or chief executive officer, and principal stockholder of, defendant TECT.

65. Some time in the mid-1960s Patrick expanded TECT's operations outside New Jersey, including turning the former sales office in California into a branch facility, and continued to carry out TECT's business and operational activities simultaneously from the two locations. Patrick directed and controlled the business affairs and operational activities of TECT at the Site and at the California branch.

66. At all times relevant in this action, Patrick was the president and/or chief executive officer, and principal stockholder of defendant Alacer.

67. Some time in the 1970s, Patrick moved office equipment, personnel, and chemical tanks in inventory from the TECT Site to California.

68. At all times relevant to this action, Patrick personally directed, conducted and managed the operations of defendant TECT, and knew or should have known the manner in which those operations or business affairs, including matters involving the storage, containment, and disposal of hazardous substances, were carried out.

69. In an interview published in the Record of Hackensack, on Thursday, June 22, 2000, Patrick admitted to having buried the drums of contaminated chemicals.

70. Defendant Patrick is a "person" who discharged hazardous substances at the Site, within the meaning of N.J.S.A. 58:10-23.11b and N.J.S.A. 58:10-23.11g.c(1).

71. Patrick is a person responsible for materials that were, or contained, hazardous substances, certain of which were discharged at the Site within the meaning of N.J.S.A. 58:10-23.11f.a(1) and/or N.J.S.A. 58:10-23.11f.b(3), and which were not satisfactorily stored or contained at the Site,

72. As a discharger and/or a person in any way responsible for the discharge, Patrick is strictly liable, as TECT's and Alacer's responsible officer, respectively, as well as in his individual capacity, jointly and severally with any other defendant, without regard to fault, for all costs plaintiffs NJDEP and Administrator have incurred, and will incur, to remediate the Site. N.J.S.A. 58:10-23.11.g.c(1).

73. By failing to comply with the November 11, 2000 Directive, Patrick is also a person who, pursuant to N.J.S.A. 58:10-23.11f.a(1), is liable in an amount equal to three times the cleanup and removal costs plaintiffs NJDEP and Administrator have incurred, and will incur, for the Site.

THIRD COUNT

74. Plaintiffs NJDEP and Administrator repeat each and every allegation of paragraphs 1 through 73 above as though fully set forth in its entirety herein.

75. Defendant Alacer is engaged in the business of manufacturing and distributing vitamins and food supplements.

76. Defendant Patrick was, and on information and belief, still is, the president and/or chief executive officer, and principal stockholder of defendant Alacer.

77. At all times relevant in this action, Patrick personally conducted, managed, or directed the operations of defendant Alacer, including the transfer in the 1970s of assets and personnel from defendant TECT to defendant Alacer where they were found and retrieved by the Bankruptcy Trustee. These assets were used by Alacer in furtherance of its vitamin business.

78. Pursuant to Patrick's testimony in the Bankruptcy proceedings to recover TECT's assets improperly transferred to Alacer, some time in the early 1970s, Patrick used Alacer's California bank account to make the payroll at the TECT Site. Therefore, during that time period, Alacer was de facto operating the TECT Site.

79. In the ordinary course of its business some time in early 1970s, defendant Alacer sold chlorinated solvents to, and accepted shipments of chemical products from, TECT's customers. Therefore,

during that time period, Alacer was de facto operating the TECT's chlorinated solvent business, including the operations at the TECT Site.

80. Some time in the early 1970s, Alacer generated, handled, and or transported materials that were, or contained, hazardous substances, certain of which were discharged at the Site within the meaning of N.J.S.A. 58:10-23.11f.a(1) and/or N.J.S.A. 58:10-23.11f.b(3).

81. Defendant Alacer is a "person" who discharged hazardous substances at the Site, within the meaning of N.J.S.A. 58:10-23.11b and N.J.S.A. 58:10-23.11g.c(1).

82. Defendant Alacer is a "person in any way responsible" for the discharge of hazardous substances at the Site, within the meaning of N.J.S.A. 58:10-23.11b and N.J.S.A. 58:10-23.11g.c(1).

83. Plaintiffs NJDEP and Administrator have incurred, and will continue to incur, costs to remediate the Site. Such costs are "cleanup and removal costs" within the meaning of N.J.S.A. 58:10-23.11b.

84. As an operator of the TECT Site, Alacer is a person who is strictly liable, jointly and severally, without regard to fault, for all costs plaintiffs NJDEP and Administrator have incurred, and will incur, to remediate the Site. N.J.S.A. 58:10-23.11.g.c(1).

85. As a discharger of hazardous substances at the Site, Alacer is a person who is strictly liable, jointly and severally,

without regard to fault, for all damages plaintiffs NJDEP and Administrator have incurred, and will incur, to restore or replace any natural resource of this State damaged or destroyed by the contamination at the Site. N.J.S.A. 58:10-23.11.g.c(1).

86. As a person responsible for materials that were, or contained, hazardous substances, certain of which were discharged at the Site, Alacer is strictly liable, jointly and severally, without regard to fault, for all costs plaintiffs NJDEP and Administrator have incurred, and will incur, to remediate the Site. N.J.S.A. 58:10-23.11.g.c(1).

87. As a person responsible for materials that were, or contained, hazardous substances, certain of which were discharged at the Site, the defendants is strictly liable, jointly and severally, without regard to fault, for all damages plaintiffs NJDEP and Administrator have incurred, and will incur, to restore or replace any natural resource of this State damaged or destroyed by the contamination at the Site. N.J.S.A. 58:10-23.11.g.c(1).

PRAYER FOR RELIEF

WHEREFORE, plaintiffs New Jersey Department of Environmental Protection, and the Administrator, New Jersey Spill Compensation Fund, pray this Court:

a. Order the defendants to reimburse plaintiffs NJDEP and Administrator, jointly and severally, without regard to fault, for

all cleanup and removal costs the plaintiffs have incurred for the site, plus applicable interest;

b. Enter declaratory judgment against the defendants, jointly and severally, without regard to fault, for any cleanup and removal costs plaintiffs NJDEP and Administrator may incur for the site;

c. Order the defendants TECT and Patrick to reimburse plaintiffs NJDEP Administrator, jointly and severally, without regard to fault, in an amount equal to three times the cleanup and removal costs plaintiffs NJDEP and Administrator have incurred for the site;

d. Enter declaratory judgment against the defendants TECT and Patrick, jointly and severally, without regard to fault, in an amount equal to three times any cleanup and removal costs plaintiffs NJDEP and Administrator may incur for the site;

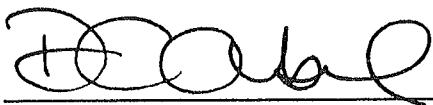
e. Order the defendants to reimburse plaintiffs NJDEP and Administrator, jointly and severally, without regard to fault, for all damages plaintiffs NJDEP and Administrator have incurred for any natural resource of this State damaged or destroyed by the contamination at the Site, plus applicable interest;

f. Enter declaratory judgment against the defendants, jointly and severally, without regard to fault, for all damages plaintiffs NJDEP and Administrator may incur for any natural

resource of this State damaged or destroyed by the contamination at the Site;

- g. Award plaintiffs NJDEP and Administrator their costs and fees in this action; and
- e. Award plaintiffs NJDEP and Administrator such other relief as this Court deems appropriate.

DAVID SAMSON
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiffs

By: 
Daisy C. Abel
Deputy Attorney General

Dated: April 22, 2002

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, the Court is advised that Daisy C. Abel, Deputy Attorney General, is hereby designated as trial counsel for plaintiffs in this action.

CERTIFICATION REGARDING OTHER PROCEEDINGS AND PARTIES

Undersigned counsel hereby certifies, in accordance with R. 4:5-1(b) (2), that the matters in controversy in this action are not the subject of any other pending or contemplated action in any

court or arbitration proceeding known to plaintiffs at this time, nor is any non-party known to plaintiffs at this time who should be joined in this action pursuant to R. 4:28, or who is subject to joinder pursuant to R. 4:29-1. If, however, any such non-party later becomes known to plaintiffs, an amended certification shall be filed and served on all other parties and with this Court in accordance with R. 4:5-1(b) (2).

DAVID SAMSON
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiffs

By: 
Daisy C. Abel
Deputy Attorney General

Dated: April 22, 2002

COMPL

Exhibit E

Los Angeles County Public Library
History and Genealogy Department -- Microfiche
Los Angeles Telephone Directory
Classified Yellow Pages August 1964

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OF CLASSIFIED DIRECTORY HEADINGS



This INDEX of Classified

headings has been expanded

to make it easier to locate

firms that provide products

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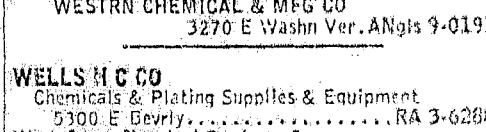
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